

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

Criminal No. 4:22-cr-20188  
Hon. Matthew F. Leitman

v.

D1, MICHAEL ANGELO,  
D2, HASSAN KAMAL FAYAD,  
D3, MIRNA KAMAL FAYAD,  
D4, CORY JUSTIN MANN,  
D5, THOMAS REED QUARTZ, and  
D6, ROSINA ANGELO,

Defendants.

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**STIPULATION TO SET TRIAL DATE AND SCHEDULING DEADLINES**

IT IS HEREBY STIPULATED AND AGREED, by and between counsel for the United States of America and the Defendants, regarding the jury trial on Counts Seven to Twelve as alleged in the Superseding Indictment in this matter (ECF No. 201) (“Indictment”), the jury trial date of January 16, 2024 and all associated deadlines shall be adjourned as to the jury trial for Counts Seven to Twelve of the Indictment, and the motion deadline, plea cut-off deadline, final pretrial conference, jury trial, and other dates shall be set as follows:

Motion Cutoff:	August 2, 2024
Plea Cutoff:	September 30, 2024
Hearing on Pretrial Motions:	September 30, 2024 at 9:30 AM
Final Pretrial Conference:	October 8, 2024 at 9:30 AM
Witness/Exhibit Lists Due:	October 8, 2024
Jury Trial:	November 6, 2024 at 9:00 AM

Defense counsel for the Defendants require additional time to receive and review the relevant evidence in this matter, adjust their schedules, and prepare for trial.

IT IS FURTHER SITPULATED that pursuant to 18 U.S.C. § 3161(h)(7)(B)(ii), the case is so complex that it is unreasonable to expect adequate preparation for pretrial proceedings or for the trial itself within typical time limits as the parties need the additional time for effective preparation and it would result in miscarriage of justice if the parties are not granted additional time for due diligence and effective preparation.

IT IS FURTHER STIPULATED that pursuant to 18 U.S.C. § 3161(h)(7)(A), (B)(i), and (B)(iv), the extended time period from each Defendant's currently scheduled trial date of January 16, 2024, until November 6, 2024, constitutes excludable delay in that exclusion of this time period from the running of the Speedy

Trial Act is in the interest of justice and outweighs the interest of the public and each Defendant in a speedy trial.

This Stipulation and Proposed Order is agreed to by counsel for both parties.

Date: January 24, 2024

IT IS STIPULATED,

/s/ Mark McDonald

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**ORDER TO CONTINUE TRIAL DATE AND SCHEDULING DEADLINES**

This matter having come before this Honorable Court by stipulation of the parties and this Court being fully advised:

**IT IS HEREBY ORDERED** that regarding the jury trial on Counts Seven to Twelve as alleged in the Superseding Indictment in this matter (ECF No. 201) (“Indictment”), the jury trial date of January 16, 2024 and all associated deadlines shall be adjourned as to the jury trial for Counts Seven to Twelve of the Indictment, and the motion deadline, plea cut-off deadline, final pretrial conference, jury trial, and other dates shall be set as follows:

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**IT IS FURTHER ORDERED** that pursuant to 18 U.S.C. § 3161(h)(7)(B)(ii), the case is so complex that it is unreasonable to expect adequate preparation for pretrial proceedings or for the trial itself within typical time limits as the parties need the additional time for effective preparation and it would result in miscarriage of justice if the parties are not granted additional time for due diligence and effective preparation.

**IT IS FURTHER ORDERED** that pursuant to 18 U.S.C. § 3161(h)(7)(A), (B)(i), and (B)(iv), the extended time period from each Defendant's currently scheduled trial date of January 16, 2024 until November 6, 2024 constitutes excludable delay in that exclusion of in that exclusion of this time period from the running of the Speedy Trial Act is in the interest of justice and outweighs the interest of the public and each Defendant in a speedy trial.

s/Matthew F. Leitman  
MATTHEW F. LEITMAN  
UNITED STATES DISTRICT JUDGE

Dated: January 25, 2024